

Exhibit 2

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

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February 23, 2020

Via electronic mail

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Re: *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Counsel:

I am writing with respect to the February 21, 2020 letter that the Plaintiffs' Executive Committees ("Plaintiffs") filed with the Court and the supporting Declaration submitted by Andrew J. Maloney. *See* ECF 6003; 6003-2.

These submissions contain the extremely serious allegation that "Saudi Arabia" is actively intimidating potential witnesses, including threatening to murder a potential witness and that witness's family and "stalking" another potential witness thereby "sending a message that they could get him/her at any time and make him/her disappear."

To be absolutely clear, Saudi Arabia categorically rejects these assertions and considers them to be both baseless and scurrilous. We have raised this issue with the highest levels of the Saudi government. No Saudi Arabian government official, employee, agent, or anyone acting on Saudi Arabia's behalf has attempted in any way to threaten any potential witness in this proceeding or sought to prevent any potential witness from testifying.

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We cannot overstate how strongly we dispute these allegations and our determination to refute them. We request that Plaintiffs provide by no later than Wednesday, February 26, 2020, the identity of all witnesses referenced in paragraphs 3-8 of Mr. Maloney's declaration, as well as any and all support for these allegations. We will agree to maintain this information on an Attorneys' Eyes Only basis, and it will not be shared with our client, pending a court ruling on the terms of an appropriate protective order. Following receipt of this information, we intend to seek sworn testimony of these witnesses regarding the assertions made in Plaintiffs' submission. We intend to share all that information with the Court and the Department of Justice.

Please inform us by no later than Monday, February 24, 2020, whether Plaintiffs will provide this requested information by February 26, 2020. If Plaintiffs refuse, we will immediately seek all appropriate relief with the Court.

Sincerely,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia